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July 13, 2020

VIA ECF

Hon. Sarah L. Cave, U.S. Magistrate Judge United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: Ravi Sundar v. Greyhound Lines, Inc., Greyhound Inc. and

Greyhound Bus Lines, Inc. Docket No. 19-cv-290 (VEC)

Dear Magistrate Judge Cave:

We represent the Defendant Greyhound Lines, Inc. in the above-referenced matter.

Subsequent to our conversation with Plaintiff's counsel, we are making this letter motion to compel the deposition of the Plaintiff. Plaintiff's counsel has informed us that Plaintiff cannot appear for an in-person deposition due to concerns about the COVID-19 virus. In addition, Plaintiff does not have the technological capability/set-up to appear for a virtual deposition either. Defendant cannot possibly prepare an adequate defense of this matter without completing Plaintiff's deposition. The Court has imposed a deadline of July 27, 2020 to complete the deposition of the parties. As such, we are making this letter motion asking the Court to compel the deposition of the Plaintiff by a date certain.

We thank Your Honor for your attention to this matter.

In light of the conference held with the parties yesterday, July 14, 2020, the motion to compel the deposition of Plaintiff is DENIED without prejudice to renewal.

The Clerk of Court is respectfully directed to close the Motion at ECF No. 20.

SO ORDERED 7/15/2020

Respectfully submitted,

Saiful Islam, Esq.

Lewis Brisbois Bisgaard & Smith LLP

Attorneys for Defendant

Greyhound Lines, Inc.

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SARAH L. CAYE

United States Magistrate Judge